1 2 3 4 5 6 7 8 9 10	Richard M. Heimann (State Bar No. 63607) Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260) Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298) Anne B. Shaver (State Bar No. 255928) Lisa J. Cisneros (State Bar No. 251473) LIEFF CABRASER HEIMANN & BERNS 275 Battery Street, 29th Floor San Francisco, California 94111-3339 Telephone: 415.956.1000 Facsimile: 415.956.1008 Joseph R. Saveri (State Bar No. 130064) Lisa J. Leebove (State Bar No. 186705) James D. Dallal (State Bar No. 277826) JOSEPH SAVERI LAW FIRM 255 California, Suite 450 San Francisco, California 94111 Telephone: 415.500.6800 Facsimile: 415.500.6803	TEIN, LLP
12 13	Lead Counsel for Plaintiff Class	
14	UNITED STAT	TES DISTRICT COURT
15	NORTHERN DIS	STRICT OF CALIFORNIA
16	SAN J	OSE DIVISION
17		
18	IN RE: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION	Master Docket No. 11-CV-2509-LHK
19	THIS DOCUMENT RELATES TO:	DECLARATION OF LISA J. CISNEROS IN SUPPORT OF PLAINTIFFS' NOTICE
20	All Actions	OF SUPPLEMENTAL MOTION AND SUPPLEMENTAL MOTION FOR CLASS
21		CERTIFICATION, AND MEMORANDUM OF LAW IN SUPPORT
22		Date: August 8, 2013
23		Time: 1:30 pm Courtroom: 8, 4 th Floor
24		Judge: Honorable Lucy H. Koh
25	I I i a I Ciana I I	
26	I, Lisa J. Cisneros, declare:	imm of Lieff Columna Hairran O Dametei H.D.
27		irm of Lieff, Cabraser, Heimann & Bernstein, LLP, a
28	member of the state bar of Camornia, and a	am admitted to practice before the United States
		CISNEROS DECLARATION

1	District Court	for the Northern District of California. I am one of the counsel for the Plaintiffs in
2	this action. I	make this declaration based on my own personal knowledge. If called upon to
3	testify, I could	d and would testify competently to the truth of the matters stated herein.
4	I. Depos	sition Testimony
5	A.	Adobe
6	2.	Attached hereto as Exhibit A is a true and correct copy of the excerpts for the
7	March 15, 20	13 deposition of Bruce Chizen, former Chief Executive Officer.
8	3.	Attached hereto as Exhibit B is a true and correct copy of the excerpts for the
9	March 1, 2013	3 deposition of Digby Horner, Senior Vice President of Engineering.
10	4.	Attached hereto as Exhibit C is a true and correct copy of the excerpts for the
11	March 28, 20	13 deposition of Rosemary Arriada-Keiper, former Manager of Global
12	Compensation	1.
13	5.	Attached hereto as Exhibit D is a true and correct copy of the excerpts for the
14	August 21, 20	012 deposition of Donna Morris, Senior Vice President Global Human Resources.
15	6.	Attached hereto as Exhibit E is a true and correct copy of the excerpts for the
16	February 28,	2013 deposition of Shantanu Narayen, Chief Executive Officer.
17	7.	Attached hereto as Exhibit F is a true and correct copy of the excerpts for the April
18	5, 2013 depos	sition Debbie Streeter, Vice President, Total Rewards.
19	8.	Attached hereto as Exhibit G is a true and correct copy of the excerpts for the
20	October 5, 20	12 deposition of Jeffrey Vijungco, Vice President Worldwide Talent Acquisition.
21	В.	<u>Apple</u>
22	9.	Attached hereto as Exhibit H is a true and correct copy of the excerpts for the
23	March 5, 2013	3 deposition of David Alvarez, Recruiting Manager and former Research Manager.
24	10.	Attached hereto as Exhibit I is a true and correct copy of the excerpts for the
25	March 1, 2013	3 deposition of Darrin Baja, former Recruiting Manager.
26	11.	Attached hereto as Exhibit J is a true and correct copy of the excerpts for the
27	March 7, 2013	3 deposition of Richard Bechtel, Director of Executive Recruiting.

28

1	23.	Attached hereto as Exhibit V is a true and correct copy of the excerpts for the
2	March 13, 20	13 deposition of Jonathan Rosenberg, Advisor to the Office of CEO and former
3	Senior Vice I	President of Product Management (2002 – 2011).
4	24.	Attached hereto as Exhibit W is a true and correct copy of the excerpts for the
5	deposition E	ric Schmidt, Executive Chairman, member of the Board, and former CEO (2001-
6	2011).	
7	25.	Attached hereto as Exhibit X is a true and correct copy of the excerpts for the
8	deposition Fr	ank Wagner, Director of Compensation.
9	D.	<u>Intel</u>
10	26.	Attached hereto as Exhibit Y is a true and correct copy of the excerpts for the
11	November 21	, 2012 deposition of Deborah Conrad, Senior Vice President of Human Resources.
12	27.	Attached hereto as Exhibit Z is a true and correct copy of the excerpts for the
13	March 15, 20	13 deposition of Randall Goodwin, Technology Development Manager.
14	28.	Attached hereto as Exhibit AA is a true and correct copy of the excerpts for the
15	March 22, 20	13 deposition of Renee James, Manager of the Software and Services Group.
16	29.	Attached hereto as Exhibit BB is a true and correct copy of the excerpts for the
17	March 20, 20	13 deposition of Daniel McKell, Compensation and Benefits Specialist.
18	30.	Attached hereto as Exhibit CC is a true and correct copy of the excerpts for the
19	February 14,	2013 deposition of Patricia Murray, Senior Vice President and Director of
20	Leadership S	trategy and former President of Human Resources.
21	31.	Attached hereto as Exhibit DD is a true and correct copy of the excerpts for the
22	January 29, 2	2013 deposition of Paul Otellini, Chief Executive Officer of Intel and Member of the
23	Google Boar	d of Directors.
24	Е.	<u>Intuit</u>
25	32.	Attached hereto as Exhibit EE is a true and correct copy of the excerpts for the
26	February 5, 2	2013 deposition of Bill Campbell, Chairman of Intuit Board of Directors, Co-Lead
27	Director of A	apple, and "advisor" to Google.
	1	

28

1	42.	Attached hereto as Exhibit OO is a true and correct copy the excerpts for the
2	February 12,	2013 deposition of Michelle Maupin, Senior Manager, Compensation
3	43.	Attached hereto as Exhibit PP is a true and correct copy of the excerpts for the
4	February 5, 2	013 deposition of Jan Van der Voort, Chief Administrative Officer.
5	G.	<u>Pixar</u>
6	44.	Attached hereto as Exhibit QQ is a true and correct copy of excerpts for the March
7	19, 2013 dep	osition of Dana Batali, Vice President of RenderMan Products.
8	45.	Attached hereto as Exhibit RR is a true and correct copy of the excerpts for the
9	January 24, 2	013 deposition of Edward Catmull, President.
10	46.	Attached hereto as Exhibit SS is a true and correct copy of the excerpts for the
11	August 2, 20	12 deposition of Lori McAdams, Vice President of Human Resources and
12	Administration.	
13	47.	Attached hereto as Exhibit TT is a true and correct copy of excerpts for the August
14	3, 2012 depos	sition of James Morris, General Manager and Executive Vice President of
15	Production ar	nd former Head of Production.
16	48.	Attached hereto as Exhibit UU is a true and correct copy of the excerpts for the
17	November 3,	2012 deposition of Pamela Zissimos, Senior Recruiter.
18	49.	Attached hereto as Exhibit VV is a true and correct copy of the excerpts for the
19	March 5, 201	3 deposition of Stephanie Sheehy, Manager of Human Resources Analysis.
20	II. <u>Depos</u>	sition Exhibits
21	50.	Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' Exhibit 8,
22	LUCAS0001	4721.
23	51.	Attached hereto as Exhibit 119 is a true and correct copy of Plaintiffs' Exhibit 119
24	PIX00001263	3.
25	52.	Attached hereto as Exhibit 129 is a true and correct copy of Plaintiffs' Exhibit 129
26	53.	Attached hereto as Exhibit 137 is a true and correct copy of Plaintiffs' Exhibit 137
27	PIX00003974	4.
28		

1	54.	Attached hereto as Exhibit 139 is a true and correct copy of Plaintiffs' Exhibit 139,
2	PIX00004883	3.
3	55.	Attached hereto as Exhibit 173 is a true and correct copy of Plaintiffs' Exhibit 173,
4	GOOG-HIGH	H-TECH-00193034.
5	56.	Attached hereto as Exhibit 175 is a true and correct copy of Plaintiffs' Exhibit 175,
6	GOOG-HIGH	I-TECH-00061 040.
7	57.	Attached hereto as Exhibit 176 is a true and correct copy of Plaintiffs' Exhibit 176,
8	GOOG-HIGH	H TECH-00000004.
9	58.	Attached hereto as Exhibit 186 is a true and correct copy of Plaintiffs' Exhibit 186,
10	GOOG-HIGH	H TECH-00008964.
11	59.	Attached hereto as Exhibit 187 is a true and correct copy of Plaintiffs' Exhibit 187,
12	231APPLE00	2149.
13	60.	Attached hereto as Exhibit 192 is a true and correct copy of Plaintiffs' Exhibit 192,
14	GOOG-HIGH	H TECH-000001 07.
15	61.	Attached hereto as Exhibit 199 is a true and correct copy of Plaintiffs' Exhibit 199,
16	231APPLE00	2140.
17	62.	Attached hereto as Exhibit 202 is a true and correct copy of Plaintiffs' Exhibit 202,
18	76526DOC00	00011.
19	63.	Attached hereto as Exhibit 210 is a true and correct copy of Plaintiffs' Exhibit 210,
20	ADOBE_000	611.
21	64.	Attached hereto as Exhibit 216 is a true and correct copy of Plaintiffs' Exhibit 216,
22	ADOBE_050	720.
23	65.	Attached hereto as Exhibit 223 is a true and correct copy of Plaintiffs' Exhibit 223,
24	231APPLE00	2143.
25	66.	Attached hereto as Exhibit 250 is a true and correct copy of Plaintiffs' Exhibit 250,
26	231APPLE00	06876.
27	67.	Attached hereto as Exhibit 268 is a true and correct copy of Plaintiffs' Exhibit 268,
28	231APPLE00	9277.

1095912.3 - 7 - CISNEROS DECLARATION NO. 11-CV-2509-LHK

1	60	A. 1 11 . E 1'1' 070'
1	68.	Attached hereto as Exhibit 278 is a true and correct copy of Plaintiffs' Exhibit 278,
2	231APPLE00	02150.
3	69.	Attached hereto as Exhibit 279 is a true and correct copy of Plaintiffs' Exhibit 279,
4	231APPLE00	02151.
5	70.	Attached hereto as Exhibit 295 is a true and correct copy of Plaintiffs' Exhibit 295,
6	Adobe_05207	76.
7	71.	Attached hereto as Exhibit 331 is a true and correct copy of Plaintiffs' Exhibit 331,
8	LUCAS0006	1414.
9	72.	Attached hereto as Exhibit 359 is a true and correct copy of Plaintiffs' Exhibit 359,
10	LUCAS0002	4981.
11	73.	Attached hereto as Exhibit 360 is a true and correct copy of Plaintiffs' Exhibit 360,
12	LUCAS0018	8912.
13	74.	Attached hereto as Exhibit 369 is a true and correct copy of Plaintiffs' Exhibit 369,
14	PIX00003599	Э.
15	75.	Attached hereto as Exhibit 391 is a true and correct copy of Plaintiffs' Exhibit 391,
16	76583DOC00	03750.
17	76.	Attached hereto as Exhibit 392 is a true and correct copy of Plaintiffs' Exhibit 392,
18	76583DOC00	03888.
19	77.	Attached hereto as Exhibit 393 is a true and correct copy of Plaintiffs' Exhibit 393,
20	76583DOC00	02007.
21	78.	Attached hereto as Exhibit 397 is a true and correct copy of Plaintiffs' Exhibit 397,
22	76583DOC00	08097.
23	79.	Attached hereto as Exhibit 398 is a true and correct copy of Plaintiffs' Exhibit 398,
24	76579DOC00	05956.
25	80.	Attached hereto as Exhibit 399 is a true and correct copy of Plaintiffs' Exhibit 399,
26	76582DOCb(00004.
27	81.	Attached hereto as Exhibit 400 is a true and correct copy of Plaintiffs' Exhibit 400,
28	765825DOC	001211.

- 8 -

CISNEROS DECLARATION NO. 11-CV-2509-LHK

1095912.3

1	82.	Attached hereto as Exhibit 416 is a true and correct copy of Plaintiffs' Exhibit 416,
2	Declaration of	of Donna Morris of Adobe Systems Inc. In Support of Defendants Opposition to
3	Plaintiffs' Mo	otion for Class Certification.
4	83.	Attached hereto as Exhibit 420 is a true and correct copy of Plaintiffs' Exhibit 420,
5	PIX00006025	5.
6	84.	Attached hereto as Exhibit 424 is a true and correct copy of Plaintiffs' Exhibit 424,
7	PIX00009182	2.
8	85.	Attached hereto as Exhibit 458 is a true and correct copy of Plaintiffs' Exhibit 458,
9	76616DOC00	07593.
10	86.	Attached hereto as Exhibit 472 is a true and correct copy of Plaintiffs' Exhibit 472,
11	GOOG-HIGH	H-TECH-00195005.
12	87.	Attached hereto as Exhibit 478 is a true and correct copy of Plaintiffs' Exhibit 478,
13	76616DOC02	12164.
14	88.	Attached hereto as Exhibit 557 is a true and correct copy of Plaintiffs' Exhibit 557,
15	GOOG-HIGH	H-TECH-00293087.
16	89.	Attached hereto as Exhibit 563 is a true and correct copy of Plaintiffs' Exhibit 563,
17	231APPLE07	73139.
18	90.	Attached hereto as Exhibit 597 is a true and correct copy of Plaintiffs' Exhibit 597,
19	GOOG-HIGH	H-TECH-00056882.
20	91.	Attached hereto as Exhibit 608 is a true and correct copy of Plaintiffs' Exhibit 608,
21	GOOG-HIGH	H-TECH-00255349.
22	92.	Attached hereto as Exhibit 614 is a true and correct copy of Plaintiffs' Exhibit 614,
23	GOOG-HIGH	H-TECH-00379327.
24	93.	Attached hereto as Exhibit 616 is a true and correct copy of Plaintiffs' Exhibit 616,
25	GOOG-HIGH	H-TECH-00210242.
26	94.	Attached hereto as Exhibit 621 is a true and correct copy of Plaintiffs' Exhibit 621,
27	GOOG-HIGH	H-TECH-00336877.
28		

CISNEROS DECLARATION NO. 11-CV-2509-LHK

1095912.3

1	95.	Attached hereto as Exhibit 648 is a true and correct copy of Plaintiffs' Exhibit 648,
2	GOOG-HIGH	I-TECH-00265514.
3	96.	Attached hereto as Exhibit 650 is a true and correct copy of Plaintiffs' Exhibit 650,
4	GOOG-HIGH	I-TECH-00265638.
5	97.	Attached hereto as Exhibit 651 is a true and correct copy of Plaintiffs' Exhibit 651,
6	GOOG-HIGH	H-TECH-00058868.
7	98.	Attached hereto as Exhibit 653 is a true and correct copy of Plaintiffs' Exhibit 653,
8	GOOG-HIGH	I-TECH-00058495.
9	99.	Attached hereto as Exhibit 660 is a true and correct copy of Plaintiffs' Exhibit 660,
10	GOOG-HIGH	I-TECH-00246586.
11	100.	Attached hereto as Exhibit 661 is a true and correct copy of Plaintiffs' Exhibit 661,
12	GOOG-HIGH	I-TECH-00059839.
13	101.	Attached hereto as Exhibit 666 is a true and correct copy of Plaintiffs' Exhibit 666,
14	GOOG-HIGH	I-TECH-00248307.
15	102.	Attached hereto as Exhibit 668 is a true and correct copy of Plaintiffs' Exhibit 668,
16	GOOG-HIGH	I-TECH-00248336.
17	103.	Attached hereto as Exhibit 674 is a true and correct copy of Plaintiffs' Exhibit 674,
18	GOOGcHJGI	H-TECH-00252601
19	104.	Attached hereto as Exhibit 690 is a true and correct copy of Plaintiffs' Exhibit 690,
20	LUCAS00013	3705.
21	105.	Attached hereto as Exhibit 710 is a true and correct copy of Plaintiffs' Exhibit 710,
22	LUCAS0019	4841.
23	106.	Attached hereto as Exhibit 711 is a true and correct copy of Plaintiffs' Exhibit 711,
24	Declaration o	f Michelle Maupin In Support of Defendants Opposition to Plaintiffs' Motion for
25	Class Certific	ation.
26	107.	Attached hereto as Exhibit 715 is a true and correct copy of Plaintiffs' Exhibit 715,
27	LUCAS0018	8708.
28		

1	108.	Attached hereto as Exhibit 716 is a true and correct copy of Plaintiffs' Exhibit 716.
2	LUCAS0018	5312.
3	109.	Attached hereto as Exhibit 727 is a true and correct copy of Plaintiffs' Exhibit 727.
4	LUCAS0020	1067.
5	110.	Attached hereto as Exhibit 728 is a true and correct copy of Plaintiffs' Exhibit 728.
6	LUCAS0006	0705.
7	111.	Attached hereto as Exhibit 729 is a true and correct copy of Plaintiffs' Exhibit 729
8	LUCAS0019	8130.
9	112.	Attached hereto as Exhibit 730 is a true and correct copy of Plaintiffs' Exhibit 730
10	LUCAS0019	9904.
11	113.	Attached hereto as Exhibit 781 is a true and correct copy of Plaintiffs' Exhibit 781
12	76596DOC01	701 0.
13	114.	Attached hereto as Exhibit 872 is a true and correct copy of Plaintiffs' Exhibit 872
14	GOOG-HIGH	I-TECH-00264994.
15	115.	Attached hereto as Exhibit 912 is a true and correct copy of Plaintiffs' Exhibit 912
16	INTUIT_040	817.
17	116.	Attached hereto as Exhibit 914 is a true and correct copy of Plaintiffs' Exhibit 914.
18	INTUIT_001	614.
19	117.	Attached hereto as Exhibit 944 is a true and correct copy of Plaintiffs' Exhibit 944
20	LUCAS0006	1513.
21	118.	Attached hereto as Exhibit 945 is a true and correct copy of Plaintiffs' Exhibit 945
22	LUCAS00189	9276.
23	119.	Attached hereto as Exhibit 959 is a true and correct copy of Plaintiffs' Exhibit 959
24	LUCAS0018	8708.
25	120.	Attached hereto as Exhibit 1107 is a true and correct copy of Plaintiffs' Exhibit
26	1107, INTUI	Γ_007865.
27	121.	Attached hereto as Exhibit 1130 is a true and correct copy of Plaintiffs' Exhibit
28	1130, 231AP	PLE099371.

1	122. Attached hereto as Exhibit 1158 is a true and correct copy of Plaintiffs' Exhibit
2	1158, ADOBE_005661.
3	123. Attached hereto as Exhibit 1159 is a true and correct copy of Plaintiffs' Exhibit
4	1159, ADOBE_019278.
5	124. Attached hereto as Exhibit 1160 is a true and correct copy of Plaintiffs' Exhibit
6	1160, ADOBE_009652.
7	125. Attached hereto as Exhibit 1250 is a true and correct copy of Plaintiffs' Exhibit
8	1250, ADOBE_011976.
9	126. Attached hereto as Exhibit 1305 is a true and correct copy of Plaintiffs' Exhibit
10	1305, PIX00049042.
11	127. Attached hereto as Exhibit 1306 is a true and correct copy of Plaintiffs' Exhibit
12	1306, PIX00012996.
13	128. Attached hereto as Exhibit 1308 is a true and correct copy of Plaintiffs' Exhibit
14	1308, Pixar Salary Analysis.
15	129. Attached hereto as Exhibit 1309 is a true and correct copy of Plaintiffs' Exhibit
16	1309, PIX00049648.
17	130. Attached hereto as Exhibit 1376 is a true and correct copy of Plaintiffs' Exhibit
18	1376, 231APPLE039426.
19	131. Attached hereto as Exhibit 1600 is a true and correct copy of Plaintiffs' Exhibit
20	1600, 2004 Google Salary Ranges.
21	132. Attached hereto as Exhibit 1606 is a true and correct copy of Plaintiffs' Exhibit
22	1606, GOOG-HIGH TECH-00036287.
23	133. Attached hereto as Exhibit 1609 is a true and correct copy of Plaintiffs' Exhibit
24	1609, GOOG-HIGH-TECH-004 75237.
25	134. Attached hereto as Exhibit 1613 is a true and correct copy of Plaintiffs' Exhibit
26	1613, GOOG~IGH-TECH-00473658.
27	135. Attached hereto as Exhibit 1618 is a true and correct copy of Plaintiffs' Exhibit
28	1618, GOOG-HIGH-TECH-00474897.

1	136. Attached hereto as Exhibit 1625 is a true and correct copy of Plaintiffs' Exhibit
2	1625, GOOG-HIGH-TECH-00506628.
3	137. Attached hereto as Exhibit 1629 is a true and correct copy of Plaintiffs' Exhibit
4	1629, GOOG-HIGH-TECH-00509662.
5	138. Attached hereto as Exhibit 1753 is a true and correct copy of Plaintiffs' Exhibit
6	1753, GOOG-HIGH-TECH-00325500.
7	139. Attached hereto as Exhibit 1760 is a true and correct copy of Plaintiffs' Exhibit
8	1760, INTUIT _052803.
9	140. Attached hereto as Exhibit 1761 is a true and correct copy of Plaintiffs' Exhibit
10	1761, INTUIT _049796.
11	141. Attached hereto as Exhibit 1854 is a true and correct copy of Plaintiffs' Exhibit
12	1854, 2231APPLE100673.
13	142. Attached hereto as Exhibit 1855 is a true and correct copy of Plaintiffs' Exhibit
14	1855, Declaration of Steven Burmeister In Support of Defendants' Opposition to Plaintiffs
15	Motion for Class Certification.
16	143. Attached hereto as Exhibit 1856 is a true and correct copy of Plaintiffs' Exhibit
17	1856, 231APPLE1 05342.
18	144. Attached hereto as Exhibit 1858 is a true and correct copy of Plaintiffs' Exhibit
19	1858, 231APPLE098912.
20	145. Attached hereto as Exhibit 1859 is a true and correct copy of Plaintiffs' Exhibit
21	1859, 231APPLE1 05324.
22	146. Attached hereto as Exhibit 1868 is a true and correct copy of Plaintiffs' Exhibit
23	1868, GOOG-HIGH-TECH-00550729.
24	147. Attached hereto as Exhibit 1869 is a true and correct copy of Plaintiffs' Exhibit
25	1869, GOOG-HIGH-TECH-00550725.
26	148. Attached hereto as Exhibit 1870 is a true and correct copy of Plaintiffs' Exhibit
27	1870, GOOG-HIGH-TECH-00550726.

1	149. Attached hereto as Exhibit 1871 is a true and correct copy of Plaintiffs' Exhibit
2	1871, GOOG-HIGH-TECH-00061052.
3	150. Attached hereto as Exhibit 1872 is a true and correct copy of Plaintiffs' Exhibit
4	1872, GOOG-HIGH-TECH-00550723.
5	151. Attached hereto as Exhibit 2030 is a true and correct copy of Plaintiffs' Exhibit
6	2030, Declaration of Danny McKell In Support Of Opposition to Class Certification.
7	152. Attached hereto as Exhibit 2033 is a true and correct copy of Plaintiffs' Exhibit
8	2033, 76657DOC004599.
9	153. Attached hereto as Exhibit 2035 is a true and correct copy of Plaintiffs' Exhibit
10	2035, 76657DOC019261.
11	154. Attached hereto as Exhibit 2084 is a true and correct copy of Plaintiffs' Exhibit
12	2084, LUCAS00218268.
13	155. Attached hereto as Exhibit 2088 is a true and correct copy of Plaintiffs' Exhibit
14	2088, LUCAS00218299.
15	156. Attached hereto as Exhibit 2002 is a true and correct copy of Plaintiffs' Exhibit
16	2092, LUCAS00217253.
17	157. Attached hereto as Exhibit 2094 is a true and correct copy of Plaintiffs' Exhibit
18	2094, LUCAS00218283.
19	158. Attached hereto as Exhibit 2096 is a true and correct copy of Plaintiffs' Exhibit
20	2096, LUCAS00217124.
21	159. Attached hereto as Exhibit 2100 is a true and correct copy of Plaintiffs' Exhibit
22	2100, LUCAS00217547.
23	160. Attached hereto as Exhibit 2135 is a true and correct copy of Plaintiffs' Exhibit
24	2135, INTUIT_034255.
25	161. Attached hereto as Exhibit 2140 is a true and correct copy of Plaintiffs' Exhibit
26	2140, INTUIT_039756.
27	162. Attached hereto as Exhibit 2142 is a true and correct copy of Plaintiffs' Exhibit
28	2142 INTUIT 039793

1	163. Attached hereto as Exhibit 2422 is a true and correct copy of Plaintiffs' Exhibit		
2	2422, GOOG-HIGH-TECH-00328300.		
3	164. Attached hereto as Exhibit 2425 is a true and correct copy of Plaintiffs' Exhibit		
4	2425, GOOG-HIGH TECH-00625147.		
5	165. Attached hereto as Exhibit 2426 is a true and correct copy of Plaintiffs' Exhibit		
6	2426, GOOG-HIGH-TECH-00281629.		
7	166. Attached hereto as Exhibit 2486 is a true and correct copy of Plaintiffs' Exhibit		
8	2486, Declaration of Donna Morris of Adobe Systems Inc. In Support of Defendants Opposition		
9	to Plaintiffs Motion for Class Certification.		
10	167. Attached hereto as Exhibit 2487 is a true and correct copy of Plaintiffs' Exhibit		
11	2487, ADOBE_100600.		
12	168. Attached hereto as Exhibit 2501 is a true and correct copy of Plaintiffs' Exhibit		
13	2501, ADOBE_009425.		
14	169. Attached hereto as Exhibit 2735 is a true and correct copy of Plaintiffs' Exhibit		
15	2735, GOOG-HIGH-TECH-00480249.		
16	170. Attached hereto as Exhibit 2738 is a true and correct copy of Plaintiffs' Exhibit		
17	2738, INTUIT_043557.		
18	171. Attached hereto as Exhibit 2739 is a true and correct copy of Plaintiffs' Exhibit		
19	2739, INTUIT_043560.		
20	172. Attached hereto as Exhibit 2740 is a true and correct copy of Plaintiffs' Exhibit		
21	2740, INTUIT _052841.		
22	173. Attached hereto as Exhibit 2743 is a true and correct copy of Plaintiffs' Exhibit		
23	2743, INTUIT_041933.		
24	174. Attached hereto as Exhibit 2744 is a true and correct copy of Plaintiffs' Exhibit		
25	2744, INTUIT 052826.		
26	175. Attached hereto as Exhibit 2800 is a true and correct copy of Plaintiffs' Exhibit		
27	2800, ADOBE_068264.		

28

Case5:11-cv-02509-LHK Document418-2 Filed05/10/13 Page16 of 18

1	I declare under penalty of perjury under the laws of the United States that the foregoing is		
2	true and correct.		
3	Executed May 10, 2013, in San Francisco, California.		
4	/s/ Lina I. Cinnaros		
5	<u>/s/ Lisa J. Cisneros</u> Lisa J. Cisneros		
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

CISNEROS DECLARATION - 16 -1095912.3

NO. 11-CV-2509-LHK

1 2 3 4 5 6 7 8	Richard M. Heimann (State Bar No. 63607) Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260) Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298) Anne B. Shaver (State Bar No. 255928) Lisa J. Cisneros (State Bar No. 251473) LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 Battery Street, 29th Floor San Francisco, California 94111-3339 Telephone: 415.956.1000 Facsimile: 415.956.1008 Joseph R. Saveri (State Bar No. 130064) Lisa J. Leebove (State Bar No. 186705) James D. Dallal (State Bar No. 277826) JOSEPH SAVERI LAW FIRM 255 California, Suite 450 San Francisco, California 94111 Telephone: 415.500.6800			
9				
10				
11	Facsimile: 415.500.6803			
12	Lead Counsel for Plaintiff Class			
13	LIMITED OF A TEC DIOTRICT COLUMN			
14	NODENEDNI DIGEDICE OF CALLEODNIA			
15				
16				
17 18	IN RE: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION	Master Docket No. 11-CV-2509-LHK		
19	THIS DOCUMENT RELATES TO:	MANUAL FILING NOTIFICATION PURSUANT TO LOCAL RULE 5.1(f)		
20	All Actions			
21				
22	MANUAL FILING NOTIFICATION			
23				
24	Cisneros in Support of Plaintiffs' Supplemental Motion for Class Certification.			
25	1. This filing is in physical form only, and is being maintained in the case file in the			
26	Clerk's office. If you are a participant on this case, this filing will be served in hard-copy shortly.			
27	2. For information on retrieving this filing directly from the Court, please see the			
28	Court's main website at http://www.cand.uscourts.gov under Frequently Asked Questions (FAQ).			
		MANUAL FILING NOTIFICATION		

Case5:11-cv-02509-LHK Document418-2 Filed05/10/13 Page18 of 18

1	3. This filing was not efiled for the following reason(s):
2	Voluminous Document (PDF file size larger than efiling system allowances)
3	Unable to Scan Documents
4	Physical Object (description): Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media
5	Item Under Seal
	Conformance with the Judicial Conference Privacy Policy (General Order 53).
6	X Other (description): Pending Motion to Seal Filed on May 10, 2013
7 8	Executed May 10, 2013, in San Francisco, California.
9	/s/ Lisa J. Cisneros
10	Lisa J. Cisneros
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	